

1 Bradley P. Hartman (#017263)
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2 **HARTMAN TITUS PLC**
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6 Attorneys for Defendant

7 **IN THE UNITED STATES DISTRICT COURT**
8 **FOR THE DISTRICT OF ARIZONA**

9 James Oliver Romine Jr.,

10 No. 2:16-cv-00604-JJT

11 Plaintiff,

12 **STIPULATION FOR DISMISSAL WITH**
12 **PREJUDICE**

13 vs.

14 James Nicholas Stanton,

15 Defendant.

16 Pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), the parties hereby stipulate and agree to the
17 dismissal of all claims in this action, including the claims raised in the Amended Complaint of
18 February 3, 2017, with prejudice with each party to bear its own costs and attorneys' fees.

19 Plaintiff agrees to forever refrain from directly or indirectly filing against Defendant any
20 cause of action arising from the same facts or circumstances alleged in the Amended
21 Complaint. Plaintiff also agrees to refrain from taking action against Defendant's business,
22 such as sending DMCA takedown notices, without first considering whether Defendant is
23 engaged in fair use of a copyright under 17 U.S.C. § 107, as required under federal law and
24 *Lenz v. Universal Music Corp.*, 801 F.3d 1126 (9th Cir. 2015).

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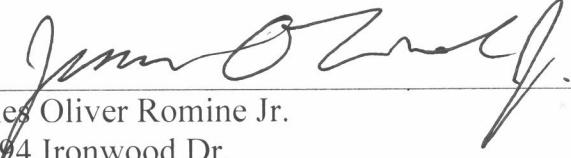
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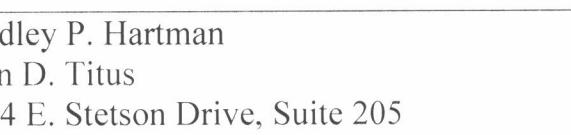
1 DATED this 19th day of February, 2017.

2 **JAMES OLIVER ROMINE JR.**

3 By: 

4
5 James Oliver Romine Jr.
6 12494 Ironwood Dr.
7 Yuma, Arizona 85367
8 Plaintiff

9 **HARTMAN TITUS PLC**

10 By: 

11
12 Bradley P. Hartman
13 John D. Titus
14 7114 E. Stetson Drive, Suite 205
15 Scottsdale, Arizona 85251-3250
16 Attorneys for Defendant

1 DATED this 20th day of February, 2017.

2 **HARTMAN TITUS PLC**

3

4 By: /s/ Bradley P. Hartman

5 Bradley P. Hartman
6 John D. Titus
7 7114 E. Stetson Drive, Suite 205
8 Scottsdale, Arizona 85251-3250
9 Attorneys for Defendant

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1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on February 20, 2017, I caused the
3 foregoing document to be filed electronically with the
4 Clerk of Court through CM/ECF System for filing and
transmittal of Notice to the following CM/ECF registrant:

5 James Oliver Romine Jr.
6 12494 Ironwood Dr.
7 Yuma, AZ 85367
jromine2445@gmail.com
8 *Plaintiff*

9

10 /s/ Bradley P. Hartman
